

1 Craig J. Mariam (SBN: 225280)
2 Michelle J. Wells (SBN: 279967)
3 GORDON & REES LLP
4 633 W. Fifth Street, Suite 5200
5 Los Angeles, CA 90071
Telephone: (213) 576-5000
Facsimile: (877) 306-0043
cmariam@gordonrees.com
mwells@gordonrees.com

6 | Attorneys for Telscape Communications, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

I, Michelle J. Wells, declare as follows:

1. I am an attorney with Gordon & Rees LLP, counsel for Telscape Communications, Inc. (“Telscape”) in this matter. I have personal knowledge of the matters contained in this supplemental declaration and if called to testify to them could and would do so competently.

2. On November 2, 2012, having received no opposition to Telscape's motion to quash or modify the subpoena issued by Rightscorp, Inc., I filed a notice of non-opposition to Telscape's motion, which is identified as number 10 on the Court's docket.

3. At approximately 4:00 p.m. on November 2, 2012 (which was

1 subsequent to my filing of the notice of non-opposition), I received a telephone
2 message from counsel for Rightscorp, Inc., Dennis J. Hawk of Business Law
3 Group. Mr. Hawk's telephone message indicated that Rightscorp, Inc. did not
4 intend to oppose Telscape's motion. The message further indicated that in the
5 event Telscape's motion was granted, Rightscorp, Inc. would likely re-serve the
6 subpoena – to which Telscape would object on the same basis as presented through
7 this instant motion.

8 I declare under penalty of perjury under the laws of the United States of
9 America that the above statements are true and accurate to the best of my
10 knowledge.

11 Executed this 5th day of November, 2012.



12
13 Michelle J. Wells
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Gordon & Rees LLP
633 West Fifth Street, 52nd Floor
Los Angeles, CA 90071